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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BRUCE WILCOX and CONNIE WILCOX,

Plaintiffs,

V.

## PORTFOLIO RECOVERY ASSOCIATES, LLC.

Defendant.

CASE NO. 20-cv-01545-JAD-NJK

**DEFENDANT PORTFOLIO  
RECOVERY ASSOCIATES, LLC'S  
MOTION FOR EXTENSION OF  
TIME TO RESPOND TO  
PLAINTIFFS' SECOND  
AMENDED COMPLAINT**

## **(First Request)**

COMES NOW Defendant, Portfolio Recovery Associates, LLC, ("PRA"), by counsel, and moves this Honorable Court for an order granting a 28-day extension of time in which to respond to Plaintiffs' Second Amended Complaint. In support thereof, PRA states as follows:

1. On October 1, 2021, Plaintiffs filed a First Amended Complaint. [ECF No. 53].
2. On June 3, 2022, an Order granting in part PRA's Motion to Dismiss Plaintiffs' First Amended Complaint was entered by the Court, providing leave to amend. [ECF No. 63].
3. On June 17, 2022, PRA filed its Answer to the First Amended Complaint. [ECF No. 65].
4. On June 23, 2022, Plaintiffs filed their Second Amended Complaint. [ECF No. 66].
5. PRA's response to the Second Amended Complaint is due on July 7, 2022.
6. PRA has good cause to make this request, as it will use the additional time to review Plaintiffs' lengthy newly amended pleading and evaluate whether Plaintiffs have plead

1           actionable claims sufficient to cure the deficiencies set forth in this Court's order dated  
2           June 3, 2022 [ECF No. 63]. Further, the Fourth of July holiday resulted in a truncated  
3           period requiring additional time for PRA's counsel to engage in this analysis.

4           7. Undersigned counsel has attempted to confer with Plaintiffs regarding this request for  
5           time extension. Specifically, on July 5, 2022, undersigned counsel emailed Plaintiffs  
6           seeking a stipulation to extend the time for PRA to respond to Plaintiffs' Second  
7           Amended Complaint. As of the date and time of the filing of this Motion, Plaintiffs have  
8           not responded to counsel's request.

9  
10           8. The grounds for this Motion are made in good faith and not in an attempt to unnecessarily  
11           delay the case. Pursuant to District of Nevada Local Rule IA 6-1(a), no previous grants of  
12           extension of time have been requested by PRA to respond to the Second Amended  
13           Complaint.

14  
15           WHEREFORE, Defendant, Portfolio Recovery Associates, LLC, respectfully requests  
16           that this Court grant it an extension of time up to and including August 4, 2022 to answer, move,  
17           or otherwise respond to the Second Amended Complaint.

18  
19           DATED July 7, 2022.

Respectfully submitted,

20           GORDON REES SCULLY  
21           MANSUKHANI, LLP

22           **GRANTED. NO FURTHER**  
23           **EXTENSIONS WILL BE ALLOWED.**

24           IT IS SO ORDERED.

25           Dated: July 13, 2022

/s/ Lori N. Brown

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26             
27           Nancy J. Koppe  
28           United States Magistrate Judge

*Attorney for Portfolio Recovery  
Associates, LLC*